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The Lands Council
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November 19, 2018

USDA Forest Service
Attn: Objection Reviewing Officer
210 14th Street, SW
EMC Mailstop 1104
Washington, DC 20250

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RE: Interested Person Request regarding the Revised Colville Forest Plan

This is notification The Lands Council, Kettle Range Conservation Group, and Western Watersheds Project are requesting Interested Person Status on objections filed by the following groups and individuals. A brief explanation of the objection of interest and reason for our interest follows the bulleted objector.

Name(s) of the objector(s) in whose objection the person has an interest;

- *Washington State Cattlemen's Association, Public Lands Council, National Cattlemen's Beef Association.*
 - Objection: Aquatic and riparian management is in conflict with our objection.
 - Objection states current management strategies are effectively managing impacts from livestock; we strongly disagree
 - Objection argues riparian buffers are too stringent; we strongly disagree.
 - Objection: Annual Grazing Use Indicators
 - Objection requests decreased stubble height guidelines from 4 inches to 2.75 inches; we strongly disagree and believe stubble heights should be 6 inches.

- Objection: Recreational and Permitted Grazing Management - Fish Redds, MA-GDL-RMA-13
 - Argues against exclosures to secure fish redds, we disagree and find this is in conflict with our objection to protect riparian areas and watersheds from grazing impacts.
- Objection: Management of Livestock Grazing to Attain Desired Conditions, MA-STD-RMA-09 Removal of livestock requires a significant change to management of the forest and could adversely impact the ecological balance.
 - Removal of livestock may be necessary to attain desired conditions in an ecosystem. Changes in management practices to attain desired conditions may be necessary.
- Objection: Increased restriction: access to grazing allotments by reducing road densities and creating non-motorized and wilderness areas.
 - Objection is in conflict with our objection, filed jointly as the Northeast Washington Forest Coalition (NEWFC), that Wilderness designation is needed to protect high value habitat in the CNF.
- Objection: The Plan will increase the risk of wildfire by reducing access through road density reduction and increasing fuel loads by reducing grazing.
 - This is in conflict with our objection that livestock grazing is a causal factor in increases in catastrophic fire, and increased fuel loads in the form of grasses and forbs is the natural condition of the forest.
 - Decreases in road density are a key component in reducing access to high value wilderness areas.
 - Most fire ignitions are human caused, and near roads.
- *Justin Hedrick*
 - Objection: Wilderness designation will end grazing allotments
 - This is a false statement.
 - Objection: Stubble height requirements restrictive
 - This conflicts with our objection that stubble heights should be more restrictive.
 - Additionally, requirements such as stubble height are only significant in the presence of monitoring, data which is absent in the LRMP.
 - Objection: Revised Forest plan states it will manage for a condition, which is wrong, we should be managing for a product.
 - This is contrary to our stated position that the forest should be managed for resilience and desired conditions.
- *Stevens County Commissioners*
 - Objection: Riparian Area Stubble Height not site specific or peer reviewed
 - This contrary to our stated position that stubble height should be set at a minimum of 6 inches forest wide in riparian areas.
 - Objection: Water quantity has not been adequately addressed and more policies are needed.
 - SCCs object that forest water resources are not adequately allocated for human need, this is in conflict with our objection that the forest should be managed for wildlife first.

- Objection: Inclusion of Recommended Wilderness in the RLMP.
 - SCCs object to the inclusion of wilderness, we object that there is not enough wilderness included in the RLMP.

- *American Forest Resource Council*
 - Objection: AFRC believes that setting the 20" diameter limit is an arbitrary decision made by the Forest with little or no scientific backing. This diameter limit which is lower and more restrictive than the Eastside Screens will decrease management opportunities, further reduce volume outputs, decrease forest health, and increase the likelihood of litigation.
 - Objection: The Final Plan does not sufficiently address the needs of the Forest for immediate restoration and a static 21-inch rule has been made obsolete.
 - This is in conflict with the adopted 21" rule supported in our letter filed jointly with NEWFC. 21" and larger trees are lacking across the Forest compared with historic conditions.
 - Objection: Recommended road densities are arbitrary and not achievable.
 - This is in conflict with our comment filed jointly with NEWFC, supporting to no net increase in roads.

- *Pend Oreille County Board of Commissioners*
 - Objection: Proposed wilderness; current wilderness acres are adequate to fulfill the need
 - This in conflict with our objection that more acres need to be designated as wilderness.
 - Objection: Road Densities; road restrictions hinder restoration goals.
 - This is in conflict with our support of no net increase in roads.
 - Objection: Forest Health-Vegetation Management; vegetation management treatments, per the plan, will move to slow, more aggressive logging is needed.
 - This is in conflict with our filing as part of NEWFC moderating harvest levels to long term sustainable levels.
 - Objection: Grazing; Grazing is an effective fire management tool. Grazing creates more foliage and stimulates improved topsoil. Riparian standards are too restrictive and must be revised.
 - This is in conflict with our objection that grazing has been found to increase the risk of catastrophic fire, compacts soil and is not restrictive enough in riparian areas.

- *Ferry County Board of Commissioners*
 - Objection: ...any Wilderness Recommendation be removed from the proposed plan and that the Forest should instead recommend those areas as backcountry allowing for the increased multi-use activities.
 - This is conflict with our objection, filed jointly with NEWFC, that questions the decrease in Wilderness designation from the draft LMP to the Revised LMP.

- *Stevens County Cattleman's Association*
 - Objections to Standards:


- FW-STD-WL-02. Canada Lynx - Vegetation Management within the Kettle-Wedge Lynx Core Area
- FW-STD-WL-03. Canada Lynx - Rate of Change within the Kettle-Wedge Lynx Core Area
- FW-STD-WL-04. Canada Lynx - Groomed and Designated Winter Routes within the Kettle-Wedge Lynx Core Area
- FW-STD-WL-05. Canada Lynx - Vegetation Management within the Kettle-Wedge Lynx Core Area
- FW-STD-WL-06. Canada Lynx - Tree Stem Densities in the Kettle-Wedge Lynx Core Area
 - Objecting to these standards is in conflict with our position supporting critical habitat designations for Canada lynx.
- Objection to Standards FW-STD-WR-01. Properly Functioning Watersheds
 - This objection is in conflict with our position that we should have properly functioning watersheds and should be moving toward desired conditions at all times.
- Objection to FW-STD-SOIL-01. Effective Ground Cover
 - This objection is in conflict with our position that effective ground cover is a necessity for health soils and watersheds.
- Objection to FW-STD-VEG-02. Threatened, Endangered and Sensitive Plant Species [minus] Surveys; This constitutes a stated requirement to conduct intensive and non-exclusive monitoring surveys across the Forest prior to allowing essentially any management action (or activity - including recreational pursuits) - that could potentially be habitat disturbing.
 - This is in conflict with our position that prior to actions being taken in the forest, impacts are assessed as required by NEPA law to determine impacts of the action.
- Objection to FW-OBJ-WR-05. Key Watershed Restoration Prioritization; This could effect/limit/curtail all management activities, including grazing and recreation.
 - This objection is in conflict with our position that watershed restoration and preservation should be prioritized over permitted activities. Public lands should be managed under the Public Trust Doctrine, not for private industry.
- Objection to FW-OBJ-WR-09. Stream Restoration in Key Watersheds; restore hydrologic, geomorphic, and riparian process and function on 81 miles of stream within 15 years of forest plan implementation through activities including streambank stabilization, restoration of lateral and vertical hydrologic connectivity, and improvement of stream channel and floodplain function.
 - This objection is in conflict with our position that watershed restoration should be a forest wide priority.
- *Teck Washington Inc., Pend Oreille Operations*
 - Objection: Teck objects to the designation of mineral-rich areas near Metaline Falls as Recommended Wilderness.
 - This objection is in conflict with our position that the wilderness recommendations include three areas identified as Abercrombie-Hook.nose (29,330 acres), Bald Snow (17,400 acres) and Salmo-Priest Adjacent (14,900 acres) should move forward.
 - Objection: Teck objects to the Forest Service's decision to manage Recommended Wilderness areas as if they were already designated as Wilderness by Congress.

- This objection is in conflict with our position that recommended wilderness designation recognizes the criteria necessary for wilderness are present. Management of these areas should prioritize maintenance of those criteria.
- Objection: The Forest Service should not identify mineral rich areas near Metaline Falls as Research Natural Areas.
 - This objection is in conflict with our stated position that lands held in the public trust should be preserved and maintained with the highest levels of protection for the benefits of the majority of the people.
- Objection: The Forest Service should not include mineral rich areas near Metaline Falls in the Backcountry Management areas.
 - This objection is in conflict with our stated position that lands held in the public trust should be preserved and maintained with the highest levels of protection for the benefits of the majority of the people.

The Lands Council, Kettle Range Conservation Group and Western Watersheds Project provided substantive formal comment provided by the interested person requester during the planning process demonstrating the requester's participation in the planning process.

- The Lands Council filed both comment and objection to the CNF RLMP.
 - <https://cara.ecosystem-management.org/Public/Letter/1790940?project=45826>

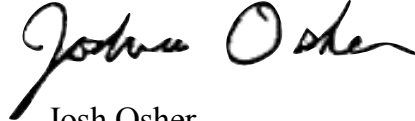
Respectfully,



Mike Petersen
Executive Director
The Lands Council



Tim Coleman
Executive Director
Kettle Range Conservation Group



Josh Osher
Montana Director
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Cc: Chris Bachman